

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

<b>TRAVIS CLOSE and TINA CLOSE et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>No. 1:18-cv-110</b>
	)	
<b>v.</b>	)	<b>JURY DEMAND</b>
	)	
<b>COOL RUNNINGS EXPRESS, INC., and BENJAMIN SCOTT BREWER,</b>	)	<b>Judge Reeves</b>
	)	<b>Magistrate Lee</b>
	)	
<b>Defendants.</b>	)	

---

**COOL RUNNINGS EXPRESS, INC.'S PRETRIAL DISCLOSURES**

---

Pursuant to the Scheduling Order entered in this case (D.E. #66) and Fed. R. Civ. P. 26(a)(3)(A)(ii) and (iii), Defendant Cool Runnings Express, Inc. makes the following pretrial disclosures:

1. The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition.

**DISCLOSURE:**

1. Benjamin Scott Brewer
2. Tina Close
3. Travis Close
4. Tim Christopherson, D.C.
5. Billy Sizemore
6. Cretty Sizemore

2. An identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises.

**DISCLOSURE:** This Defendant expects to offer the following exhibits into evidence:

1. Brands Insurance records, CR 0483-85;
2. Marten Transport agreement, CR 3770-71;
3. Marten Transport records, CR 0167-69, 0242-44;
4. MedTox records, CR 0314; and
5. Brewer employment records. CR 0164-66, 0174-91.

This Defendant may offer the following exhibits into evidence:

1. Florida accident records, CR 0307-11;
2. Plaintiff Travis Close's Responses to Esurance's First Set of Interrogatories;
3. Plaintiff Travis Close's Responses to Esurance's First Request for Production of Documents;
4. Plaintiff Travis Close's Responses to Esurance's First Request for Admissions;
5. Plaintiff Travis Close's Responses to Esurance's Second Request for Admissions;
6. Affidavit of Travis Close dated August 13, 2019, and filed as an exhibit to Plaintiffs' Response to Defendant Esurance's Motion for Summary Judgment;
7. Plaintiff Ansley Close's Responses to Esurance's First Request for Production of Documents;
8. Plaintiff Ansley Close's Response to Esurance's First Set of Interrogatories;
9. Plaintiff Gavin Close's Responses to Esurance's First Request for Production of Documents;
10. Plaintiff Gavin Close's Response to Esurance's First Set of Interrogatories;

11. Affidavit of Gavin Close dated August 26, 2019, and filed as an exhibit to Plaintiffs' Response to Defendant Esurance's Motion for Summary Judgment;
12. Plaintiff Tina Close's Responses to Esurance's First Request for Production of Documents;
13. Plaintiff Tina Close's Response to Esurance's First Set of Interrogatories;
14. Plaintiff Tina Close's Responses to Esurance's First and Second Requests for Admissions;
15. Summary of Medical Bills of Tina Close, including attachments;
16. Summary of Medical Bills of Travis Close, including attachments;
17. Fast Access Healthcare, P.L.L.C. records for Tina Close;
18. Henegar Counseling Center records for Travis Close and Tina Close;
19. North Shore Chiropractic & Rehab records for Tina Close;
20. Doctors Express records for Travis Close;
21. Fast Access Healthcare, P.L.L.C. records for Travis Close;
22. North Shore Chiropractic & Rehab records for Travis Close;
23. Signal Mountain Pediatrics records for Ansley Close;
24. Signal Mountain Pediatrics records for Gavin Close;
25. Any other documents produced or filed in this matter.

Respectfully submitted,

KAY GRIFFIN, PLLC

By: s/ Michael A. Johnson

John J. Griffin, Jr. (#15446)

Michael A. Johnson (#30210)

222 Second Avenue North, Suite 340-M

Nashville, Tennessee 37201

615-742-4800

john.griffin@kaygriffin.com

michael.johnson@kaygriffin.com

*Attorneys for Cool Runnings Express, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been served via CM/ECF upon the following:

Danny R. Ellis  
Truck Wreck Justice, PLLC  
1419 Market Street  
Chattanooga, TN 37402

Rebecca C. Blair  
Claire G. Sawyer  
The Blair Law Firm  
1608 Westgate Circle Suite 100  
Brentwood, TN 37027

Thomas M. Horne, Esq.  
Luther-Anderson, PLLP  
100 W. Martin Luther King Blvd.  
One Union Square, Suite 700  
Chattanooga, TN 37402

on this the 19th day of April, 2021.

s/ Michael A. Johnson

Michael A. Johnson